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September 17, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 17-200
***Ex Parte* Presentation**

Dear Ms. Dortch:

On September 13, 2019, Lance Johnson and Robert Burkhardt from Anterix, Inc (“Anterix”), with Jay Jacobsmeyer of Pericle Communications Company and Arif Ansari, both consultants to Anterix and both participating by telephone, and undersigned counsel for Anterix met with the Wireless Telecommunications Bureau (“WTB”) personnel listed below to discuss the above-identified Notice of Proposed Rulemaking (“NPRM”).

The Anterix representatives expressed the company’s strong support for the broadband transition approach proposed in the NPRM, as well as the licensing, operating and technical rules. They explained in detail the company’s position that the OOB standards proposed, along with the technical characteristics of LTE technology and improvements in land mobile equipment, will allow deployment of a 3/3 MHz broadband service, and a 5/5 MHz broadband service where full band-clearing can be accomplished, while providing appropriate interference protection for both in-band and adjacent band incumbents. They also noted the unique licensing position of the Association of American Railroads (“AAR”), which holds an effectively nationwide 900 MHz authorization, and endorsed again AAR’s desire to exchange its six discrete 900 MHz channels for ten contiguous channels to support important new train safety applications that cannot be deployed on narrowband spectrum.

The Anterix representatives reiterated the company’s position that the band realignment process should start with voluntary agreements. They stated that Anterix has already negotiated agreements with a number of incumbents, including several large utilities whose 900 MHz systems have been redeployed on channels in the 2/2 MHz proposed for ongoing narrowband use. They explained that the company is in discussion with many incumbents, some of which already have filed or have indicated their intention to file for experimental licenses for 900 MHz broadband operations. Some incumbents are members of the Utility Broadband Alliance (“UBBA”) and/or participated in the recent Department of Energy’s National Renewable Energy Lab (“NREL”) project demonstrating how private 900 MHz broadband networks can support the evolving power grid.

However, they also expressed agreement with the NPRM’s conclusion that an entirely voluntary process inevitably creates opportunities for hold-outs. They expressed support for the proposed “success threshold” for triggering the mandatory relocation of remaining incumbents and explained how they understood that process would work as described in Anterix’s July 2, 2019 Reply Comments. They affirmed again that incumbents subject to mandatory relocation still

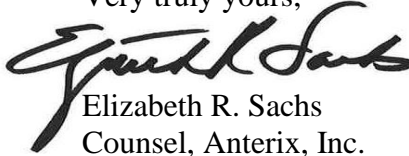
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would receive comparable facilities and have their retuning costs paid by the broadband licensee. Finally, the Anterix representatives reaffirmed that negotiations with licensees of complex systems, those with 65 or more integrated sites, should remain voluntary, but disagreed with commenters that proposed to reduce the number of sites needed to qualify as complex. They noted that 800 MHz public safety systems with over two hundred sites were rebanded successfully and that systems with fewer than 65 sites could be moved to different 900 MHz channels without experiencing any unscheduled outages or unanticipated disruptions.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs
Counsel, Anterix, Inc.

cc (via email):
Joel Taubenblatt (by telephone)
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Lloyd Coward
Amanda Huetinck
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